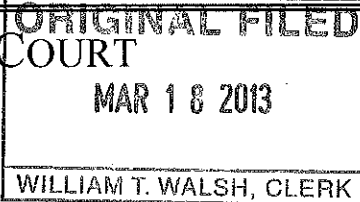


UNITED STATES DISTRICT COURT

for the
District of New JerseyUnited States of America
v.

FRANKLIN SIMMS

Case No.

Mag. No. 13-5541 (KMW)

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/10/12 through March 2013 in the county of Atlantic in the
District of New Jersey, the defendant(s) violated:*Code Section*21 U.S.C. § 846,
21 U.S.C. § 841(a)(1) and
841(b)(1)(A).*Offense Description*Conspiracy to distribute, and to possess with intent to distribute, 1 kilogram or
more of a mixture or substance containing a detectable amount of heroin.

For further description see Attachment A.

This criminal complaint is based on these facts:

See attached Affidavit of Probable Cause - Attachment B.

☒ Continued on the attached sheet.

A handwritten signature in dark ink, appearing to be "C. Kopp".

Complainant's signature

Special Agent Christopher Kopp, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/18/2013

A handwritten signature in dark ink, appearing to be "Karen Williams".

*Judge's signature*City and state: Camden, New Jersey

Honorable Karen M. Williams, U.S.M.J.

Printed name and title

CONTENTS APPROVED

UNITED STATES ATTORNEY

By: 
Patrick C. Askin, Assistant U.S. Attorney

Date: March 18, 2013

ATTACHMENT A

From in or about November 10, 2012 and continuing through in or about March 2013, in Atlantic County, in the District of New Jersey and elsewhere, the defendant,

FRANKLIN SIMMS,

did knowingly and intentionally conspire and agree with others, known and unknown, to distribute and to possess with intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

In violation of Title 21, United States Code, Section 846.